

**AMENDMENTS TO THE DRAWINGS**

The attached replacement sheet (APPENDIX A) replaces the previous sheet depicting Figure 5. The replacement sheet is meant to address the Examiner's objections, as discussed in the Remarks section of this paper. No new matter has been added.

### **REMARKS**

Claims 35-46 are pending in this application. In view of the foregoing amendments and following comments, reconsideration and allowance of all the rejected claims are respectfully requested.

### **DRAWINGS**

In response to the Examiner's objection to the drawings, a formal drawing is being submitted as a replacement sheet (see APPENDIX A). The replacement sheet reflects an amendment to Figure 5. Specifically, the information related to individual functionalities of a plurality of filters is now shown by way of example, at a look up table 523 in the drawing. This change is reflected also in the amendment to the specification, filed herewith. No new matter has been added to the drawings and specification. Withdrawal of the objection is requested.

### **REJECTION UNDER 35 U.S.C. 101**

Claims 43-46 stand rejected under 35 U.S.C. §101 as allegedly being directed to non-statutory subject matter. In particular, the Examiner alleges that "in view of Applicant's disclosure, no definite limits are placed on the computer readable medium, thus broad interpretation would allow both tangible elements (e.g. magnetic disk) and intangible embodiments (e.g. wireless signal)." See Final Action, pg. 3. Applicant traverses this rejection.

The rejection of the claims under Section 101 is improper. There is no technological arts requirement as recently confirmed in *Ex Parte Lundgren*, Appeal No.

2003-2088 (BPAI 2005). All claims as presented define patentable subject matter. As such, withdrawal of the rejection of claims 43-46 under 35 U.S.C. § 101 is requested.

**REJECTION UNDER 35 U.S.C. 103**

Claims 35, 37-39, 41-43, 45 and 46 stand rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent No. 6,941,511 to Hind et al. (hereinafter “Hind”) in view of U.S. Patent No. 6,289,382 to Bowman-Amuah. Applicants respectfully traverse this rejection on the following basis.

Claim 35 recites, among other things, the claim feature of “selecting a plurality of included filters from a plurality of filters for inclusion in the conversion pipeline configuration, based at least in part on individual filter functionalities associated with the included filters.” Claims 39 and 43 recite similar features. In the Final Action, the Examiner alleges that Hind discloses this feature (see Final Action at pg. 4-5). Hind, however, appears to describe performing predetermined transformations on a document based on a match to a predefined signature and a predetermined map definition. See Hind, e.g., col. 14 lines 46-55. The rejection in the Final Action fails to present any evidence that Hind discloses *selecting...a plurality of filters for inclusion in the conversion pipeline* configuration, much less a selection based on *individual filter functionalities*.

Claim 35 further recites, among other things, the claim feature of “*determining a filter order* for the included filters, based at least in part on individual filter functionalities, to convert user specified data.” Claims 39 and 43 recite similar features. The Examiner appears to be alleging that col. 12 lines 40-47 of Hind disclose this feature

(see Final Action on pg. 5). Hind describes a set of general transformation operations that are supported. A *set* of operations is not the same as a *filter order*. The rejection in the Final Action does not provide any evidence that Hind teaches or suggests that a *filter order* is determined, based at least in part on *individual filter functionalities*.

The Examiner acknowledges that Hind does not disclose pipeline or filter and relies on the Bowman-Amuah to overcome this deficiency (see Final Action pg. 5). There is no suggestion or motivation, however, to modify Hind with Bowman-Amuah. The Examiner alleges that “one of ordinary skill would have been motivated to apply transformations in a manner that permits flexible configuration.” See Final Action at pg. 6. The proposed combination of Hind with Bowman-Amuah is improper at least for failing to provide a proper motivation for combination. More specifically, the combination of the cited references proposed by the Examiner is improper because the references do not provide any motivation for the proposed combination because the references appear to teach away from the proposed combination.

Hind discloses transformation operations applied according to a map definition. See Hind e.g., Abstract. Hind teaches that a map definition provides “a *precise* description of the transformation operation to be performed, including a source node to be operated upon by the transformation and target location in the output document where the results of the transformation should be placed.” See Hind, e.g., col. 12 lines 26-39.

Bowman-Amuah discloses pipes that can be used to connect filters in a wide range of configurations. See Bowman-Amuah, e.g., col. 197 lines 6-9. Bowman-Amuah

teaches pipes having a variety of techniques for transferring data between filters. See Bowman-Amuah e.g., col. 179 lines 16-19.

Because of these teachings, one of ordinary skill in the art would not be motivated to combine Hind with a reference, such as Bowman-Amuah, because applying flexible configurations to transformations (Bowman-Amuah) teaches away from the precise map definitions for applying transformations (Hind). Accordingly, Hind is not properly combinable with Bowman-Amuah. Therefore, the Examiner has failed to establish a *prima facie* case of obviousness for *at least* failing to provide proper motivation to combine Hind and Bowman-Amuah.

Furthermore, the references, even if combined, fail to disclose, teach, or suggest all of the claim elements of at least independent claims 35, 39 and 43. Bowman-Amuah fails to overcome the deficiencies described above with respect to Hind. Accordingly, the rejection of independent claims 35, 39 and 43 is improper and should be reversed.

Dependent claims 37, 38, 41, 42, 45, and 46 depend from and add additional features to one of independent claims 35, 39 and 43. Thus, at least by virtue of their dependency and the additional features that they add, claims 37, 38, 41, 42, 45, and 46 are patentable over Hind and Bowman-Amuah.

Claims 36, 40, and 44 stand rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Hind and Bowman-Amuah in further view of “Computer User Dictionary” by Microsoft Press (“Microsoft”).

Microsoft does not make up for the deficiencies set forth above with regard to independent claims 35, 39 and 43. Claims 36, 40, and 44 depend from and add additional features to independent claims 35, 39 and 43, respectively. Thus, the combination of Hind, Bowman-Amuah, and Microsoft is improper and does not teach and/or suggest the features of claims 36, 40 and 44. As such, claims 36, 40 and 44 are patentable over Hind, Bowman-Amuah, and Microsoft.

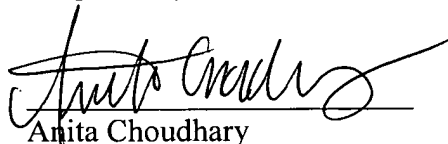
### CONCLUSION

Having addressed each of the foregoing rejections, it is respectfully submitted that a full and complete response has been made to the outstanding Office Action and, as such, the application is in condition for allowance. Notice to that effect is respectfully requested. Applicant does not necessarily agree with all of the other statements made in the Office Action, but the foregoing is sufficient to overcome the rejections.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned.

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Respectfully submitted,



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# **APPENDIX A**